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6 *Attorneys for Defendants,*
 7 **DIV HOLDINGS, LLC d/b/a JARDIN PREMIUM CANNABIS DISPENSARY**

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 ANTHONY J. GATTI, individually)	CASE NO. 2:24-cv-02390
11 Plaintiff,)	
12 vs.)	PROPOSED STIPULATED
13 DIV HOLDINGS, LLC d/b/a JARDIN PREMIUM)	DISCOVERY PLAN AND
14 CANNABIS DISPENSARY, a Nevada Limited)	SCHEDULING ORDER
15 Liability Company,)	
16 Defendant.)	SUBMITTED IN COMPLIANCE
)	WITH LR 26-1(b)

17 **1. Conference:** The parties conducted the rule 26(f) conference on April 9, 2025, with
 18 Trevor J. Hatfield. participating for Plaintiff Anthony J. Gatti, and Dione C. Wrenn, Esq., for
 19 Defendant DIV Holdings, LLC d/b/a Jardin Premium Cannabis Dispensary. This conference
 20 included discussion of the points outlined in FRSP 26(f)(2).

21 **2. Discovery Plan:**

- 22 a. The parties agree to exchange initial FRCP 26(a)(1) disclosures by April 28,
 23 2025. The Parties stipulate to service of discovery by electronic mail.
- 24 b. The parties need discovery on all of the claims and defenses presented by the
 25 parties. Th parties do not request discovery in all phases or limited or focused on particular
 26 issues.
- 27 c. The parties do not anticipate any issues regarding the disclosures, discovery, or
 28 preservation of electronically stored information. The parties do not anticipate voluminous

1 documents or electronically stored information in this action. The parties anticipate disclosure of
 2 email correspondence in PDF format, and if any party believes that native format is needed, the
 3 parties will discuss the same at that time.

4 d. The parties do not presently anticipate any issues about claims of privilege or of
 5 protection.

6 e. The parties do not request any changes to the limitations on discovery imposed
 7 under the rules. During the conference the parties discussed the limitation on the number of
 8 depositions imposed by FRCP 30(a)(2)(A)(i), and the parties do not anticipate any issue with this
 9 limitation at this time.

10 f. The parties do not request any orders from the court under FRCP26(c) at this
 11 time.

12 g. Proposed Discovery Plan Dates: The first appearance by Defendant was the
 13 answers of Defendant DIV HOLDINGS, LLC d/b/a Jardin Premium Cannabis Dispensary. The
 14 parties will endeavor to complete discovery within 180 days from that appearance and will assess
 15 the needs of the case as discovery progresses. The parties propose the following discovery
 16 schedule:

Amending Pleadings and Adding Parties	June 23, 2025
Initial Expert Disclosures & Interim Status Report	July 22, 2025
Rebuttal Expert Disclosures	August 21, 2025
Discovery Cut-Off	September 19, 2025
Dispositive Motions	October 20, 2025
Pre-Trial Order, if no dispositive motions	November 19, 2025

24 **3. Alternative Dispute Resolution:** The parties certify that they have conferred regarding
 25 alternative dispute resolution.

26 **4. Trial by Magistrate and Short Trial Program:** The parties considered trial by
 27 magistrate and use of the Short Trial Program and determined that neither would be appropriate
 28

1 for this matter.

2 **5. Electronic Evidence at Trial:** Jury trial has been demanded in this action. At this early
3 juncture the parties have not determined whether they will present evidence to the jury in
4 electronic format.

5 DATED this 30th day of April 2025.

DATED this 24th day of April 2025.

6 **GORDON REES SCULLY
7 MANSUKHANI, LLP**

HATFIELD & ASSOCIATES, LTD.

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14 **ANTHONY J. GATTI**

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16 **IT IS SO ORDERED:**

17
18 
19 **UNITED STATES MAGISTRATE JUDGE**

21 **DATED:** April 30, 2025